

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re:

**NICKEISHA KHADENE LAMEY
SALMON**

* Debtor(s)

Case Number: **5-19-04336**
Chapter: **13**

CERTIFICATE OF MAILING

The undersigned employee in the office of:

Tullio DeLuca, Esquire

hereby certifies that a copy of the attached Notice and Debtors Motion to Suspend Temporarily Trustee Payments was mailed today to all parties named on the mailing list attached hereto by regular first class mail.

DATED: June 3, 2020

SIGNED: _____

TITLE: /s/Legal Assistant

THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
WILKES-BARRE DIVISION

IN RE: :
: **CASE NO. 5: 19-bk-04336-RNO**
Nickeisha Khadene Lamey Salmon :
: **CHAPTER 13**
Debtor(s) :

Nickeisha Khadene Lamey Salmon :
MOVANT :
VS. :
CHARLES J. DEHART, III, ESQ. :
RESPONDENT :

NOTICE TO CREDITORS AND OTHER PARTIES IN INTEREST

NOTICE OF OPPORTUNITY TO OBJECT AND HEARING: Pursuant to Local Rule 2002-1(a), the Court will consider this motion, objection, or other matter without further notice or hearing unless a party in interest files an objection/response on or before **June 24, 2020**. If you object to the relief requested, you must file your objection/response with the Clerk of Court and serve a copy on the movant and movant's attorney, if one is designated.

If you file and serve an objection/response within the time permitted, the Court may schedule a hearing and you will be notified. If you do not file an objection within the time permitted, the Court will deem the motion unopposed and proceed to consider the motion without further notice or hearing, and may grant the relief requested.

DATE June 3, 2020

Clerk, U.S. Bankruptcy Court
197 South Main Street
Wilkes-Barre, PA 18701

Tullio DeLuca, Esquire
PA ID# 59887
Attorney for Debtors/Movants
381 N. 9th Avenue
Scranton, PA 18504

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IN RE: :
: **CASE NO. 5: 19-bk-04336-RNO**
Nickeisha Khadene Lamey Salmon :
: **CHAPTER 13**
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MOVANT :
VS. :
CHARLES J. DEHART, III, ESQ. :
RESPONDENT :

MOTION TO SUSPEND TEMPORARILY TRUSTEE PAYMENTS

AND NOW COMES, the Debtor, Nickeisha Lamey Salmon, by and through her attorney, Tullio DeLuca, Esquire, and respectfully represents:

1. That the Debtor filed a Chapter 13 Petition on October 07, 2019.
2. That Debtor's Chapter 13 Plan provides for monthly payments of \$290.00 to the Chapter 13 Trustee to pay attorney and Trustee fees and secured creditors.
3. Due to the Corona Virus, the Debtor's hours were reduced.
Therefore, Debtor has a temporary decrease in monthly income.
4. Therefore, Debtor is not in a position to make the Trustee payments until her immediate problem stabilizes and regains income to satisfy the Chapter 13 Plan.
5. In light of the above Debtor requests a Temporary Suspension of his Trustee payments for a period of three (3) months or earlier starting in the month of March 2020.
If Debtor's immediate problem stabilizes, Debtor will commence Trustee payments sooner.

WHEREFORE, the Debtor respectfully requests that this Court enter an Order allowing for a suspension of Trustee's monthly payments for a period of at least three (3) months and directing the Debtor to commence making monthly payments sooner if Debtor's immediate problem stabilizes.

Respectfully submitted,

Dated: June 2, 2020

/s/Tullio DeLuca
Tullio DeLuca, Esquire
PA ID # 59887
381 N. 9th Avenue
Scranton, Pa 18504
(570) 347-7764
Attorney for Debtor

Alliance One Receivables Management, Inc
6160 Mission Gorge Rd., Ste 300
San Diego, CA 92120-3449

JP Morgan Chase Bank, NA
Bankruptcy Mail Intake Team
700 Kansas Lane, Floor 1
Monroe, LA 71203-4774

Credit Collection Service
725 Canton St.
Norwood, MA 02062-2679

Charles J DeHart, III (Trustee)
8125 Adams Drive, Suite A
Hummelstown, PA 17036-8625

Kevin S Frankel
Shapiro & DeNardo, LLC
3600 Horizon Dr., Ste 150
King of Prussia, PA 19406-4702

Geico
One Geico Plaza
Bethesda, MD 20810-0002

MTA Bridges & Tunnels
Daniel DeCrescenzo, Acting President
Randall's Island, NY 10035-0035

NYC Dept of Finance
PO Box 3610, Church St., Station
New York, NY 1008-3610

NYC Dept of Finance
PO Box 3641
New York, NY 10008-3641

Nationwide Insurance
Company of America
PO Box 13958
Philadelphia, PA 19101-3958

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

Port Authority of New York
& New Jersey
225 Park Ave. South
New York, NY 10003-1604

The Progressive Corporation
6300 Wilson Mills Rd.
Mayfield Village, OH 44143-2183

Transworld Systems, Inc
1105 Schrock Rd. Ste 300
Columbus, OH 43229-1174

United States Trustee
228 Walnut Street, Suite 1190
Harrisburg, PA 17101-1722

James Warmbrodt
701 Market St., Ste 5000
Philadelphia, PA 19106-1541

Wayne Memorial Hospital
Attn; Collection Dept.
601 Park St.
Honesdale, PA 18431-1498

Wilmington Savings Fund, et. al.
c/o Carrington Mortgage Services, LLC
1600 S. Douglass Rd.
Anaheim, CA 92806-5948